



California Department of Public Health
MEMORANDUM

DATE: April 13, 2011

TO: Stewart Black, Acting Deputy Director
Department of Toxic Substances Control
1001 'I' Street
Sacramento, CA 95814-2828

FROM: Stephen Woods, Department of Defense Project Manager
Center for Environmental Health
California Department of Public Health (CDPH)
Division of Drinking Water and Environmental
Management

Stephen H. Woods

SUBJECT: U.S. Naval Station at Treasure Island (TI) – California Department of
Public Health (CDPH) Environmental Management Branch
(EMB)/Department of Toxic Substances Control (DTSC) agreement
#10-T1033

I am writing to inform you of several issues that may prevent the California Department of Public Health (CDPH) Environmental Management Branch (EMB) from providing a recommendation to support current and future Finding of Suitability to Transfer (FOST) at US Naval Station at Treasure Island (TI). We previously informed the California Department of Toxic Substances Control (DTSC) Project Manager of the concerns verbally and in a written communication dated October 29, 2010 (Attachment 1). It is our understanding that within the current FOST, Base Realignment and Closure (BRAC) plans to transfer a large area of TI out of federal control this year and possibly within the next 30 days.

The large volume of radiological contaminated material, high number of radioactive commodities (individual items or sources) and high levels of radioactive contamination identified at Site 12 and Building 233 have raised concerns with CDPH regarding the nature and extent of the radiological contamination present at TI. In addition, on February 2, 2011, during a Base Closure Technical Meeting, the Department of Navy (DON) revealed that additional radioactive sources have been found at Site 31, outside of the originally defined potentially impacted areas. This finding was not expected nor was site 31 previously identified as radiologically impacted. These findings point out that the existing TI Historical Radiological Assessment (HRA) does not adequately address the nature and extent of radioactive materials on site. The lack of an adequate radiological conceptual site model raises concerns that some sites included in the FOST may be radiologically impacted as well.

Recent survey finding by CDPH on April 5-7, 2011 of TI found 4 radiological sources outside of controlled areas (site 12), that protect a known radiological impacted site. These were areas that should have previously surveyed and cleared by DON TI Contractors. Inadequate identification of radiologically impacted or contaminated areas calls into question all remediation activities that involve removal, sorting, transport and disposal of soil and debris. Such activities may have resulted in the spread of radionuclide contamination to the proposed FOST areas. The DON needs to address these concerns.

Consequently, with the above considerations and limitations in mind, CDPH recommends that the DON fully characterize TI to determine the nature and extent of radionuclide contamination. In accordance with DON commitments in the HRA, the DON needs to conduct additional surveys, screening, and sampling at TI. Attachment 2 is EMB's review of the complex issues and steps that are necessary in order to move forward on the proposed FOST and related radiological issues.

Open communications among all agencies and other stakeholders are critical to the success of the military cleanup program. CDPH is committed to achieve the common goal of transfer of TI properties for future safe uses. However, if the property specified in the FOST is transferred to recipient(s) under state jurisdiction without EMB concurrence on unrestricted release, then the recipient(s) must apply to the Radiologic Health Branch (RHB) of CDPH for a radioactive materials license. The Application process will require supporting documentation that is not currently available from the DON. Therefore, it is likely that the recipient of the property, without EMB concurrence on unrestricted release, would need to perform much or all of the additional characterization work recommended above. In addition, the recent March 24, 2011 decision by the Nuclear Regulatory Commission (NRC) to regulate radium-226 under military control may require the NRC to review and approve any transfer of the FOST. These issues should be made very clear to the potential property recipients before they accept the property. I recommend that we meet with your staff to discuss our recommendations on a path forward on the TI FOST. If you have any questions or comments on this memorandum, please contact me at (916) 449-5583.

Attachments: 1) EMB memo to DTSC dated October 29, 2010
2) EMB review of the TI FOST and radiological issues

cc: Miren Klein
Leah Walker
Glenn Takeoka